

Exhibit A

KELLER & GOGGIN P.C.

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THIS IS A MAJOR JURY TRIAL
ASSESSMENT OF DAMAGES
HEARING IS SET FOR OCT 2020 10:09 am
A. SILIGRINI

MICHAEL MCCARTHY
2 Jacalyn Drive
Havertown, PA 19083
Plaintiff

v.

MICHAEL PERRY,
6905 Martin Hill Pike
Knoxville, Tennessee 37920

and

GLENN JOHNSON
314 Park Ave
New Castle, DE 19720

Defendants.

COURT OF COMMON PLEAS

PHILADELPHIA COUNTY

TERM

NO.:

Civil Action
Defamation

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney, and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL

PHILADLEPHIA BAR ASSOCIATION

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las páginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas or sus objeciones a las demandas en contra de su personá. Sea avisado que si usted no se defiende, la corte tomará medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero or sus propiedades u otros derechos importantes para usted. LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELÉFONO A LA OFICINA CUYA DIRECCIÓN SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE

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Plaintiff

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Defendants.

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TERM

NO.:

COMPLAINT

1. Michael and Angela McCarthy reside at 2 Jacalyn Drive, Havertown, Pa 19083.
2. Michael Perry has an office at 6905 Martin Hill Pike, Knoxville, Tennessee 37902.
3. Glenn Johnson resides at 314 Park Ave, New Castle, Delaware 19720.
4. Most of the acts giving rise to this claim occurred in Philadelphia, Pa.

COUNT 1
DEFAMATION

5. On or about, October 14, 2019, Defendants published and or caused to be published false, and defamatory information about Plaintiff to third parties.

6. Defendants published both in writing and by spoken word, the before mentioned defamatory information knowing it to be false and misleading.

7. Defendant published this information knowing it would damage the reputation of Plaintiff within his community and work.

8. Defendants has multiple contacts and conducts commercial activity in Philadelphia.

9. Defendants have multiple members that live and regularly work in Philadelphia.

10. Defendants actions have caused Plaintiff the loss of his General Chairman elected position.

11. As a result of the loss of the General Chairman position Plaintiff has lost pay, benefits and pension increases.

13. As a result of the Defendants false information Plaintiff has lost his job and seniority at CSX railroad.

14. As a result of the Defendant's false information Plaintiff has suffered and will continue to suffer economically, physically and emotionally.

15. As a result of the defendant's false statements and writings along with the job loss and financial loss Plaintiff has suffered severe emotional distresses well as pain and suffering all of which will continue into the future.

WHEREFORE Plaintiff request this Honorable Court award damages in excess of \$50,000.00.

COUNT 2
LOSS OF CONSORTIUM

16. Paragraphs 1-15 are contained in this count as if fully written out here.

17. As a result of Defendant's actions delineated above, Angela McCarthy has been deprived of the customary services of her husband. Those services include emotional, physical, financial and other services, to her detriment.

WHEREFORE Plaintiffs request this Honorable Court award damages in excess of \$50,000.00.

BY: /s/ Robert S. Goggin, III
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